

multiple versions. It would seem totally impracticable for each interconnecting CLEC to maintain a suite of software sufficient to match every conceivable combination of ILEC central office software.

9. If, in spite of the significant cost penalty, the ILEC were to physically disconnect network elements before making them available, it would be necessary to establish clear protocols to ensure that CLEC technicians have access needed both to physically recombine the elements and to reestablish the software instructions with a minimum of disruption of service. For example, the ILEC would have to establish (1) a procedure for notifying the CLEC when the disconnection will take place, (2) a procedure for affording CLEC technicians concurrent access to combine the elements immediately thereafter to minimize disruption of service, as well as (3) a procedure to ensure that the CLEC technicians are fully informed of the operations they will have to perform and the equipment they will need. If the ILEC were to disconnect the elements electronically, it would have to establish a procedure giving CLEC technicians (1) notice of when this will occur, (2) an opportunity for immediate access to the ILEC system software for purposes of re-establishing the combination, as well as (3) sufficient instruction in the operation of the software to enable them to accomplish that task. Such coordination creates numerous opportunities for the ILEC to cripple the CLEC's provisioning efforts.

10. The procedures that BellSouth has established for physical collocation are inappropriate in several respects for the temporary access to its network that CLEC technicians would need to re-establish network element combinations. For example, BellSouth typically does not allow CLEC technicians into its central office space. Rather, CLECs must arrange for collocation and pay ILEC charges assessed for "Space Construction Fee" and for space rental. In South Carolina, BellSouth charges \$4,500 as a construction fee, which is based on construction

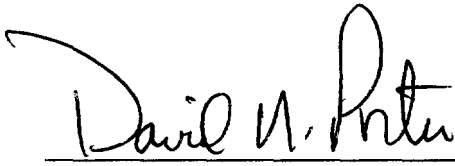
of a 100 square-foot enclosure. But the cross-connection of a voice-grade local exchange loop to a switch port should require at most a simple terminal block, which could be mounted in a few inches of space on a relay rack that itself occupies less than 5 square feet. In such a situation, to require a 100 square foot enclosure is grossly excessive and would require more cross-office connections than the ILEC requires when it provisions service.

11. To require physical collocation at the site of every possible central office where WorldCom might want to combine network elements that it orders from an ILEC would require a hundred fold increase in WorldCom's collocation sites. In addition to the unnecessary costs imposed, this proliferation of collocation spaces has other implications. Collocation is now performed typically at those ILEC central office nearest to the CLEC's own facilities, and is done for the purpose of connecting the two networks at points where the CLEC has or expects to have a significant number of customers. It is typically done in only a few ILEC offices when the CLEC first enters the market. At that point, the period of three to four months required to implement a collocation agreement is not necessarily disruptive, because it occurs when the CLEC is also taking other preparatory market entry steps. However, if collocation must take place before the CLEC can order unbundled network elements at central offices not involved in previous orders, then collocation will become a procedure that must occur in connection with obtaining new customers. At that point, a delay of several months would be intolerable. Either the CLEC is effectively prevented from competing for new business in new areas or it must arrange collocation in advance at any central office where it might eventually win a customer. This advance planning may well be appropriate in areas where the CLEC plans to focus its primary marketing efforts, but it is particularly unreasonable when the CLEC needs to serve only a few lines (for example, for remote locations), for customers whose principal place of business

is served either directly by the CLEC or via a collocation arrangement in the CLEC office nearest the customer's principal location.

12. Finally, if every CLEC were required to acquire a minimum of 100 square feet to collocate in every ILEC central office, the ILEC likely would soon run out of space creating yet another barrier to CLEC entry.

I hereby affirm that the foregoing is true and correct to the best of my information and belief.


David N. Porter

Subscribed and sworn to before me this
13th day of November, 1997.

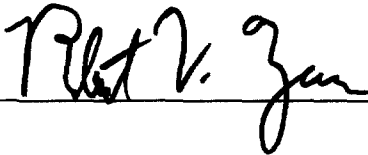

Notary Public

My Commission Expires 12/14/2001

Commenter: WorldCom, Inc.
Applicant: BellSouth
State: South Carolina
Date: November 14, 1997

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing REPLY COMMENTS OF WORLDCOM, INC. IN OPPOSITION TO BELL SOUTH'S APPLICATION FOR INTERLATA AUTHORITY IN SOUTH CAROLINA were served to each on the attached mailing list, either by Hand Delivery (as designated with an asterisk (*)), or by First Class Mail, postage prepaid, this 14th day of November 1997.



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